

## FRANK & ASSOCIATES, P.C.

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Neil M. Frank

November 26, 2007

**Via ECF**

Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 630  
New York, NY 10007

**Re: Paulino v. News Corp a.k.a. NYP Holdings, Inc. d.b.a. The New York Post  
Index No. CV 07-8593 (GBD)**

Your Honor:

This office represents Plaintiff, Daniel Paulino, in the above referenced ERISA case. On or about November 8, 2007, Defendant filed a motion to dismiss, for summary judgment and sanctions. Plaintiff's Opposition is currently near due. Plaintiff, with consent of Defendant's counsel, seeks permission to extend the time for submission of Opposition papers to on or about December 27, 2007 with a reply date of January 14, 2008. This is Plaintiff's first request of this nature. The parties have met and agreed to abide by the above schedule if it is acceptable to this Court. Thank you for your consideration of this request and related courtesies.

Respectfully,

FRANK & ASSOCIATES, P.C.

/s/

Neil M. Frank (NF0521)

IMS/ims

CC: Barry Levy, Esq.

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~ Employment, Labor Relations and Benefits Litigation ~

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